

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CENTURY INDEMNITY COMPANY (as  
Successor to CCI INSURANCE COMPANY, as  
successor to INSURANCE COMPANY OF  
NORTH AMERICA), INSURANCE COMPANY  
OF NORTH AMERICA,

Plaintiffs,

- v. -

CATERPILLAR INC. (as successor to Caterpillar  
Tractor Co.),

Defendant.

Case No. 1:15-cv-4542

**NOTICE OF MOTION AND HEARING**

PLEASE TAKE NOTICE that Plaintiffs Century Indemnity Company and Insurance Company of North America shall present to the Court, at a date and time to be determined, the Motion for Leave to File the Unredacted Complaint Under Seal, a copy of which is being served upon defendant Caterpillar Inc. Plaintiffs ask the Court to allow the filing under seal at least until such time as the Defendant may be heard regarding the filing under seal.

Dated: May 22, 2015  
Chicago, Illinois

Respectfully submitted,

By: /s/Brian C. Coffey

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Company of North America*

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